

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Re: Camara J. Thorpe	:	CHAPTER 13
	:	
Debtor	:	NO.: 16 – 14471 mdc
	:	
M & T Bank	:	
	:	
Movant	:	
v.	:	
	:	
Camara J. Thorpe	:	
Debtor	:	
	:	
William C. Miller, Esquire	:	
	:	

Objection to Motion for Relief From the Automatic Stay

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. However, Debtor stands ready willing and able to remedy his post – petition mortgage arrears immediately.
7. Denied. After a reasonable investigation, Debtor is without knowledge or information sufficient to believe the truth of the averments contained in paragraph 7 of M & T Bank’s Motion.
8. Denied. After a reasonable investigation, Debtor is without knowledge or information sufficient to believe the truth of the averments contained in paragraph 8 of M & T Bank’s Motion.

9. Denied. Debtor stands ready willing and able to remedy his post – petition mortgage arrears immediately.

10. Denied. Debtor stands ready willing and able to remedy his post – petition mortgage arrears immediately.

11. Denied. Debtor stands ready willing and able to remedy his post – petition mortgage arrears immediately.

WHEREFORE, Debtor who respectfully requests that Creditor's Motion be Denied.

Date: February 14, 2017

/s/ Demetrius J. Parrish, Jr.
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